

EXHIBIT A

In the United District Court

For the District of Delaware

Rothschild Digital Confirmation, LLC,

Plaintiff,

v.

CompanyCam, Inc.

C.A. No. 19-1109-MN

Defendant.

Notice of Serving Answers to Defendant's Interrogatories

Plaintiff has served its verified answers to Defendant's Interrogatories to Ms. Rachael Lamkin via Federal Express at the correspondence address below, postage paid on September 28, 2021.

Rachael D. Lamkin
One Harbor Drive, Suite 304
Sausalito, California, 94965

Respectfully submitted,



Leigh M. Rothschild
Managing Member
Rothschild Digital Confirmation, LLC

In the United District Court
For the District of Delaware

Rothschild Digital Confirmation, LLC,
Plaintiff,

v.

CompanyCam, Inc.

C.A. No. 19-1109-MN

Defendant.

Plaintiff's Responses to Defendant's Interrogatories (Set One)

1) Describe in detail all assets of RDC since Formation, including:

a) Leased property & identity of person who paid rent/lease

None.

b) Debts/creditors

None.

c) Bank accounts

TD Bank, checking.

d) Managers/members

Please see secretary of state report, attached.

e) Persons with any ownership interest in RDC

Please see secretary of state report, attached.

f) Persons with any financial interest in this litigation

RDC and attorneys Stamatios Stamoulis and David Chavous.

g) Each contribution of capital or other funds to RDC (including date, amount, source account, payee, destination)

Only labor and U.S. Patent No. 7,456,872 (assigned to RDC in August of 2016).

h) Each distribution of profit, capital, or other funds from RDC (including date, amount, source account, payee, destination)

Objection: vague because use of the word "capital" is not defined.

i) Offices and principal place of business.

Please see secretary of state report, attached.

2) Describe in detail all Board of Directors meetings of RDC, including the dates, members of the Board present, and topics discussed.

Objection: vague and unintelligible because there are no board of directors in a limited liability company.

3) Describe each individual who directed and controlled the Litigation, and set forth which portion(s) they directed/controlled.

Attorneys Stamatios Stamoulis and David Chavous.

4) Identify the person(s) who made the decision to assert the Patent-In-Suit ('872 Patent) against CompanyCam.

Attorneys Stamatios Stamoulis and David Chavous.

5) Identify the person(s) who made the decision to assert the Patent-In-Suit ('872 Patent) against any entity.

Attorneys Stamatios Stamoulis and David Chavous.

- 6) Identify the person(s) who made the decision to dismiss the complaint in this action after the § 101 argument.

Attorneys Stamatios Stamoulis and David Chavous.

- 7) Identify with specificity all persons involved in the decisions on behalf of RDC as described in Judge Noreika's Order, DI 40 ("Fees Order"), at pg. 2

Attorneys Stamatios Stamoulis and David Chavous.

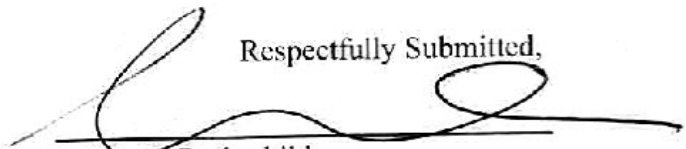
- 8) Identify with specificity all persons involved in the decisions on behalf of RDC as described in Judge Noreika's Order, DI 40 ("Fees Order"), at pg. 3

Attorneys Stamatios Stamoulis and David Chavous.

- 9) Identify with specificity all persons involved in the decisions on behalf of RDC as described in Judge Noreika's Order, DI 40 ("Fees Order"), at pg. 6

Attorneys Stamatios Stamoulis and David Chavous.

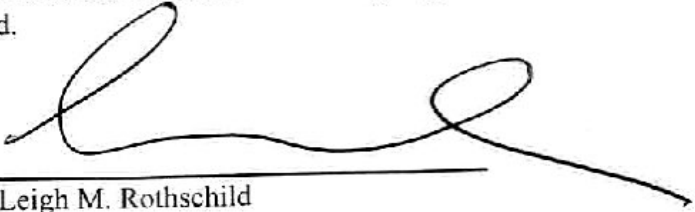
Respectfully Submitted,



Leigh M. Rothschild
Managing Member
Rothschild Digital Confirmation, LLC

CERTIFICATE OF SERVICE

On September 28, 2021, Plaintiff served upon Defendant's counsel the foregoing Answers to Interrogatories via certified mail, postage paid.



Leigh M. Rothschild
Managing Member
Rothschild Digital Confirmation, LLC



Office of the Secretary of State

CERTIFICATE OF FILING OF

Rothschild Digital Confirmation, LLC
File Number: 802520854

The undersigned, as Secretary of State of Texas, hereby certifies that a Certificate of Formation for the above named Domestic Limited Liability Company (LLC) has been received in this office and has been found to conform to the applicable provisions of law.

ACCORDINGLY, the undersigned, as Secretary of State, and by virtue of the authority vested in the secretary by law, hereby issues this certificate evidencing filing effective on the date shown below.

The issuance of this certificate does not authorize the use of a name in this state in violation of the rights of another under the federal Trademark Act of 1946, the Texas trademark law, the Assumed Business or Professional Name Act, or the common law.

Dated: 08/15/2016

Effective: 08/15/2016



A handwritten signature in black ink, appearing to read "Cascos", followed by a horizontal line.

Carlos H. Cascos
Secretary of State

[The attached addendum, if any, is incorporated herein by reference.]

Organizer

The name and address of the organizer are set forth below.

Leigh M. Rothschild **1400 Preston Road, Suite 400, Plano, TX 75093**

Effectiveness of Filing

☒ A. This document becomes effective when the document is filed by the secretary of state.

OR

☐ B. This document becomes effective at a later date, which is not more than ninety (90) days from the date of its signing. The delayed effective date is:


Execution

The undersigned affirms that the person designated as registered agent has consented to the appointment. The undersigned signs this document subject to the penalties imposed by law for the submission of a materially false or fraudulent instrument and certifies under penalty of perjury that the undersigned is authorized under the provisions of law governing the entity to execute the filing instrument.

Leigh M. Rothschild

Signature of Organizer

FILING OFFICE COPY

Secretary of State P.O. Box 13697 Austin, TX 78711-3697 FAX: 512/463-5709 Filing Fee: \$300	 Certificate of Formation Limited Liability Company	Filed in the Office of the Secretary of State of Texas Filing #: 802520854 08/15/2016 Document #: 684952590003 Image Generated Electronically for Web Filing
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Article 1 - Entity Name and Type
The filing entity being formed is a limited liability company. The name of the entity is:
Rothschild Digital Confirmation, LLC
Article 2 – Registered Agent and Registered Office
<input type="checkbox"/> A. The initial registered agent is an organization (cannot be company named above) by the name of:
OR
<input checked="" type="checkbox"/> B. The initial registered agent is an individual resident of the state whose name is set forth below:
Name:
Leigh M. Rothschild
C. The business address of the registered agent and the registered office address is:
Street Address:
1400 Preston Road
Suite 400 Plano TX 75093
Consent of Registered Agent
<input type="checkbox"/> A. A copy of the consent of registered agent is attached.
OR
<input checked="" type="checkbox"/> B. The consent of the registered agent is maintained by the entity.
Article 3 - Governing Authority
<input checked="" type="checkbox"/> A. The limited liability company is to be managed by managers.
OR
<input type="checkbox"/> B. The limited liability company will not have managers. Management of the company is reserved to the members.
The names and addresses of the governing persons are set forth below:
Manager 1: Leigh M. Rothschild
Title: Manager
Address: 1400 Preston Road Suite 400 Plano TX, USA 75093
Article 4 - Purpose
The purpose for which the company is organized is for the transaction of any and all lawful business for which limited liability companies may be organized under the Texas Business Organizations Code.
Supplemental Provisions / Information

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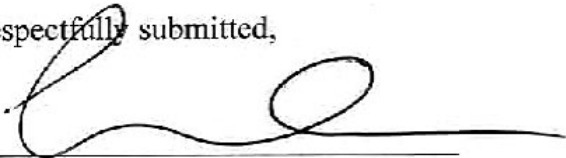
C.A. No. 19-1109-MN

Plaintiff's Responses to Defendant's Requests for Production

- 1) The records are kept in the ordinary course of business and all records can be viewed at a mutually available time at the company's headquarters or offices of accountant.
- 2) The records are kept in the ordinary course of business and all records can be viewed at a mutually available time at the company's headquarters or offices of accountant.
- 3) Objection: incomprehensible, vague, not capable of being ascertained.
- 4) Please see a copy of U.S. Patent No. 7,456,872, attached.
- 5) Please see response to RFP #4.
- 6) Please see secretary of state report, attached.
- 7) The records are kept in the ordinary course of business and all records can be viewed at a mutually available time at the company's headquarters or offices of accountant.
- 8) Please see secretary of state report, attached.
- 9) The records are kept in the ordinary course of business and all records can be viewed at a mutually available time at the company's headquarters or offices of accountant.

- 10) Objection: overbroad, nuisance. The records are kept in the ordinary course of business and all records can be viewed at a mutually available time at the company's headquarters or offices of accountant.
- 11) Objection: these documents are subject to confidentiality agreements and therefore cannot be disclosed.
- 12) Please see secretary of state report, attached.
- 13) Objection: these agreements are subject to confidentiality agreements and therefore cannot be disclosed.

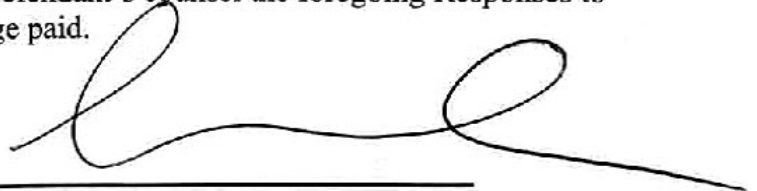
Respectfully submitted,



Leigh M. Rothschild
Managing Member
Rothschild Digital Confirmation, LLC

CERTIFICATE OF SERVICE

On September 28, 2021, Plaintiff served upon Defendant's counsel the foregoing Responses to Request for Production via certified mail, postage paid.



Leigh M. Rothschild
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Rothschild Digital Confirmation, LLC